UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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In the Matter of the Arbitration Between

10 Civ. 8682 (NRB)

GENERAL SECURITY NATIONAL INSURANCE COMPANY,

Petitioner,

-and-

AEQUICAP PROGRAM ADMINISTRATORS, INC.,

Respondent.
--X

REPLY AFFIDAVIT OF
BRUCE M. FRIEDMAN, ESQ.

BRUCE M. FRIEDMAN, being duly sworn, deposes and states as follows:

1. I am a member of the firm of Rubin, Fiorella & Friedman LLP, attorneys for Petitioner General Security National Insurance Company ("General Security") in connection with this proceeding, and a member of the Bar of this Court.

2. I submit this Affidavit in further support of General Security's Petition to Confirm an Arbitration Award. I have personal knowledge of the facts hereinafter related, except as otherwise stated, and if called as a witness in this proceeding could and would testify competently thereto.

3. A true and accurate copy of the brief submitted by General Security to the arbitration panel in the underlying arbitration in response to the motion by Respondent AequiCap Program Administrators, Inc. to reargue the Panel's award of attorneys' fees as beyond the scope of their authority is attached as Exhibit 1 hereto.

4. A true and accurate copy of General Security's Pre-Hearing Brief (without exhibits) is attached hereto as Exhibit 2.

BRUCE M. FRIEDMAN

Sworn to before me this
1st day of February 2011

Notary Public

Carolyn Davila
Notary Public State of New York
No. 01DA6031367
Qualified in Kings County
Commission Expires September 27, 2013